

DWIGHT C. HOLTON (OSB No. 09054)
Interim United States Attorney
District of Oregon
STEPHEN J. ODELL (OSB No. 90353)
Assistant United States Attorney
1000 S.W. Third Avenue, Suite 600
Portland, OR 97204-2902
(503) 727-1197 (tel) / (503) 727-1117 (fax)

IGNACIA S. MORENO
Assistant Attorney General
U.S. Department of Justice
Environment & Natural Resources Division
MARK A. NITCZYNSKI (CSB 20687)
mark.nitczynski@usdoj.gov
United States Department of Justice
Environment & Natural Resources Division
999 18th Street
South Terrace, Suite 370
Denver, CO 80202
(303) 844-1498 (tel) / (303) 844-1350 (fax)
MEREDITH L. FLAX (DCB 468016)
meredith.flax@usdoj.gov
Ben Franklin Station, P.O. Box 7369
Washington, D.C. 20044-7369
(202) 305-0404 (tel) / (202) 305-0275 (fax)

Attorneys for Federal Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

NORTHWEST ENVIRONMENTAL)
ADVOCATES,)
)
Plaintiff,)
)
v.)
UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY, et al.,)
)
Defendants,)

Civil No. 05-1876-HA

STIPULATED MOTION FOR
ENTRY OF REVISED CASE
MANAGEMENT ORDER

Stipulated Motion for Entry of
Revised Case Mgt. Order

THE STATE OF OREGON,

Intervenor-Defendant, and

NORTHWEST PULP AND PAPER
ASSOCIATION,

Intervenor-Defendant.

Plaintiff, Federal Defendants and Intervenor (collectively, “Parties”) respectfully move this Court to adopt the Revised Case Management Order. The Revised Case Management Order, which is being filed herewith, would modify the briefing schedule set forth in the Court’s Order of November 3, 2010. Doc. No. 248. Pursuant to Local Rule 7.1, undersigned counsel certify that the Parties conferred and reached agreement on the subject matter of this stipulated motion.

Respectfully submitted,

IGNACIA S. MORENO
Assistant Attorney General

/s/ Allison LaPlante
ALLISION LaPLANTE (OSB # 02361)
DANIEL P. MENSHER (OSB # 07463)
Pacific Environmental Advocacy Center
10015 S.W. Terwilliger Blvd.
Portland, OR 97219

Attorneys for Plaintiff

/s/ Mark A. Nitzynski
MARK A. NITCZYNSKI (CSB 20687)
United States Department of Justice
Environment & Natural Resources Division
999 18th Street
South Terrace, Suite 370
Denver, CO 80202

MEREDITH L. FLAX (DCB 468016)
United States Department of Justice
P.O. Box 7369
Washington, DC 20044-7369
(202) 305-0404
E-mail: meredith.flax@usdoj.gov

Attorneys for Federal Defendants

/s/ Karen Locha Moynahan
Karen Locha Moynahan
Oregon Department of Justice
Trial Division
Commercial/Condemnation/Environmental Section
1162 Court Street
Salem, OR 97301

Attorney for State of Oregon

/s/ Laura Maffei
Laura Maffei
Schwabe Williamson & Wyatt, PC
1600-1900 Pacwest Center
1211 SW Fifth Avenue
Portland , OR 97204

Attorney for Northwest Pulp and Paper
Association

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2010, I caused a true copy of the foregoing STIPULATED MOTION FOR ENTRY OF REVISED CASE MANAGEMENT ORDER to be served on each of the following counsel in the manner indicated below:

Allison LaPlante
Daniel P. Mensher
PACIFIC ENVIRONMENTAL
ADVOCACY CENTER
10015 S.W. Terwilliger Blvd.
Portland, OR 97219
laplante@lclark.edu

☐ Via Hand Delivery
☐ Via E-mail
☐ Via First-Class mail, postage pre-paid
☐ Via Overnight Mail
☒ Court notice of electronic filing via
CM/ECF

Karen Locha Moynahan
Oregon Department of Justice
Trial Division
Commercial/Condemnation/Environmental
Section
1162 Court Street
Salem, OR 97301

☐ Via Hand Delivery
☐ Via E-mail
☐ Via First-Class mail, postage pre-paid
☐ Via Overnight Mail
☒ Court notice of electronic filing via
CM/ECF

Laura Maffei
Schwabe Williamson & Wyatt, PC
1600-1900 Pacwest Center
1211 SW Fifth Avenue
Portland , OR 97204

☐ Via Hand Delivery
☐ Via E-mail
☐ Via First-Class mail, postage pre-paid
☐ Via Overnight Mail
☒ Court notice of electronic filing via
CM/ECF

/s/ Mark A. Nitzynski
MARK A. NITCZYNSKI